

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:22-cr- 00057-142

v.

INDICTMENT

ZAKARY GLOVER,

18 U.S.C. § 242

18 U.S.C. § 1201(a)(1)

Defendant.

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this indictment:

1. Defendant **ZAKARY GLOVER** served as a Direct Support Crisis Specialist for the Oregon Department of Human Services, Office of Developmental Disabilities Stabilization and Crisis Unit (SACU).

2. SACU operates several 24-hour crisis residential programs that serve individuals with intellectual and developmental disabilities.

3. Defendant **GLOVER**, while acting in his capacity as a state employee, was required to act in compliance with the United States Constitution.

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Indictment

4. As a Direct Support Crisis Specialist, defendant **GLOVER** was tasked with ensuring the health, safety, and security of the individuals who lived at the SACU where he worked.

5. Adult Victim 1 (“AV1”), an individual known to the Grand Jury, was a resident of the SACU where defendant **GLOVER** worked.

6. AV1 had severe autism, cognitive deficits, and communicated mostly through the use of pictures, videos, and drawings. AV1 used some words, but was barely verbal.

7. As part of his duties, defendant **GLOVER** took AV1 on outings in a secure van to the drive-thru of Taco Bell and similar fast-food restaurants. Defendant **GLOVER** then returned to the SACU with AV1 after these outings, where she consumed the food that was purchased.

8. On or about November 2, 2021, defendant **GLOVER**, while on an outing to Taco Bell with AV1, drove down a dead-end road toward a cemetery in Aumsville, Oregon.

9. Upon reaching the dead-end, defendant **GLOVER** parked the van, opened the passenger rear door where AV1 was sitting, lowered his shorts, grabbed AV1, and engaged in sexual misconduct.

10. After approximately five minutes, defendant **GLOVER** got back into the van and eventually drove AV1 back to the SACU.

**COUNT 1**  
**(Deprivation of Rights)**  
**(18 U.S.C. § 242)**

11. Paragraphs 1 through 10 are realleged and incorporated herein.

12. On or about November 2, 2021, in the District of Oregon, defendant **ZAKARY GLOVER**, while acting under the color of law, did willfully deprive AV1 of liberty without due

process of law, which includes the fundamental right to bodily integrity, a right secured and protected by the Constitution and laws of the United States. The defendant's conduct included attempted aggravated sexual abuse and kidnapping.

In violation of Title 18, United States Code, Section 242.

**COUNT 2**  
**(Kidnapping)**  
**(18 U.S.C. § 1201(a)(1))**

13. Paragraphs 1 through 10 are realleged and incorporated herein.

14. On or about November 2, 2021, in the District of Oregon, defendant **ZAKARY GLOVER**, did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold AV1, and in committing or in furtherance of the commission of the offense, used a van and a cell phone, each an instrumentality of interstate commerce.

In violation of Title 18, United States Code, Section 1201(a)(1).


Dated: February 15, 2022

A TRUE BILL.

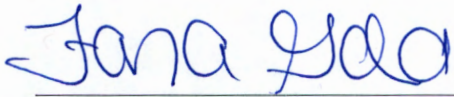
  
OFFICIATING FOREPERSON

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